

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

PATRICK LEE,

Plaintiff,

v.

CHUNG'S FAMILY, INC. d/b/a US
Beauty Mart, MAE HWA CHUNG,
and KOO PIL CHUNG,

Defendants.

CIVIL ACTION NO. 1:15-CV-04310-
LMM

**JOINT MOTION TO APPROVE SETTLEMENT AND SUBMIT
PROPOSED SETTLEMENT AGREEMENT UNDER SEAL**

COME NOW Defendant Chung's Family, Inc. d/b/a US Beauty Mart, Defendant Mae Hwa Chung, Defendant Koo Pil Chung (the "Defendants") and Plaintiff Patrick Lee (collectively, the "Parties"), by and through their undersigned counsel, and jointly move that the Court approve the Parties' settlement in accordance with applicable law and dismiss this matter, with prejudice.

Further, the Parties move this Court to file their Settlement Agreement under seal. The Parties' Settlement Agreement is concurrently being submitted separately to the Clerk for *in camera* review. Filing the Settlement Agreement in this matter under seal will advance Plaintiff and Defendants' settlement (which

provides for confidentiality), preserve judicial resources, and promote efficient administration of the proposed Settlement Agreement. Defendants do not request that the Court file its Order approving the settlement under seal. However, the Parties request that the Order approving the settlement would not include the amount of the payments to Plaintiff or Plaintiff's Counsel. In support of this Motion, the Parties submit the accompanying Memorandum of Law and incorporate it herein by reference.

WHEREFORE, the Parties respectfully request the Court grant this Motion and enter the Proposed Order: (1) approving the Parties' settlement; (2) dismissing this action with prejudice; (3) retaining jurisdiction over this case to enforce the Parties' Settlement Agreement; and (4) granting leave to file the Settlement Agreement under seal.

Respectfully submitted this 29th day of January, 2016.

/s/ Brian G. Kim

Brian G. Kim
Georgia Bar No. 479330
LEON & KIM, LLC
3006 Clairmont Road
Atlanta, Georgia 30329
678.302.1956

**Signed with express permission*

Attorney for Plaintiff
PATRICK LEE

/s/ Benson E. Pope

Benson E. Pope
Georgia Bar No. 583730
Tasha K. Inegbenebor
Georgia Bar No. 382905
LITTLER MENDELSON, P.C.
3344 Peachtree Road N.E.
Suite 1500
Atlanta, GA 30326.4803
404.233.0330

Attorneys for Defendants
CHUNG'S FAMILY, INC. d/b/a US
Beauty Mart, MAE HWA CHUNG, and
KOO PIL CHUNG

CERTIFICATION

I do hereby certify that this document has been prepared in Times Roman font, 14 point, in compliance with LR 5.1(C) of this Court.

/s/ Benson E. Pope

Benson E. Pope
Georgia Bar No. 583730

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2016, I electronically filed the forgoing **JOINT MOTION TO APPROVE SETTLEMENT AND SUBMIT PROPOSED SETTLEMENT AGREEMENT UNDER SEAL** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorney of record:

Brian G. Kim
Leon & Kim, LLC
3006 Clairmont Road
Atlanta, Georgia 30329
leonandkimllc@gmail.com

/s/ Benson E. Pope

Benson E. Pope
Georgia Bar No. 583730